

000006271

6169 RF 92

ates Government

Department of Energy

DATE 1-8-93

# memorandum

DEC 10 11 25 AM '92

Rocky Flats Office

ACTION	Hedahl
DIST	
BENEDETTI, R.L.	<input checked="" type="checkbox"/>
BENJAMIN, A.	
BERMAN, H.S.	
CARNIVAL, G.J.	
CORDOVA, R.C.	
CROUCHER, D.W.	
DAVIS, J.G.	
FERRERA, D.W.	
HANNI, B.J.	
HEALY, T.J.	
HEDAHL, T.G.	<input checked="" type="checkbox"/>
HILBIG, J.G.	<input checked="" type="checkbox"/>
IDEKER, E.H.	
KIRBY, W.A.	
KUESTER, A.W.	
LEE, E.M.	
MANN, H.P.	
MARX, G.E.	
McKENNA, F.G.	
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	<input checked="" type="checkbox"/>
RILEY, J.H.	<input checked="" type="checkbox"/>
SANDLIN, N.S.	
SATTERWHITE, D.G.	
SCHUBERT, A.L.	
SETLOCK, G.H.	ACT
SHEPLER, R.L.	
SULLIVAN, M.T.	
SWANSON, E.R.	
SWANSON, R.B.	
SWANSON, J.M.	
ZANE, J.O.	

Etchart PJ ☒  
Kallas A ☒

DEC 09 1992

WMED:EAH:13576

Comments on the 1992 Draft Environmental Monitoring Plan

T. G. Hedahl, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

My staff reviewed the 1992 Draft Environmental Monitoring Plan (transmitted by memorandum 92-RF-13092 from T. G. Hedahl to R. M. Nelson, Jr., dated November 6, 1992). Please incorporate the comments and recommended changes (attached) and submit the Final Environmental Monitoring Plan to the Department of Energy Rocky Flats Office (DOE-RFO) by January 8, 1993, for DOE-RFO review.

If there are any questions, please call me or Tom Lukow of my staff at extension 4561.

James K. Hartman  
Assistant Manager  
for Environmental Management

Attachment

cc w/o Attachment:  
T. Lukow, WMED, RFO  
D. Hauser, CSD, RFO  
A. Howard, EMB, RFO

CORRES CONTROL y y  
TRAFFIC

Reviewed for Addressee  
Corres. Control RFP

12-10-92

DATE BY

1 Ltr. #

DOCUMENT CLASSIFICATION  
REVIEW VAWER PER  
CLASSIFICATION OFFICE

ATTACHMENT  
COMMENTS ON THE 1992 DRAFT  
ENVIRONMENTAL MONITORING PLAN

No.	Page/Paragraph	Comment
1	xv/third	The groundwater monitoring program is not subdivided into six subprograms. The wells are categorized according to statement of purpose and ease location of data.
2	3-1/2	Again, the groundwater monitoring program is not categorized into six subprograms. The well are categorized for ease location of data and statement of purpose.
3	3-3/1	The Arapahoe Formation is not known to crop out west of the plant.
4	3-3/entire page	The stratigraphy section, Table 3-2, and Figure 3-1 are inconsistent with the Groundwater Protection and Monitoring Program Plan (GPMPP). In the revised GPMPP, this was determined to be unnecessarily detailed. An understanding of the regional geology is not necessary to explain the monitoring program. Table 3-2 and Figure 3-1 should be removed. The text should be revised to describe only the geologic units of interest to the groundwater program.
5	3-6/1	The Arapahoe is no longer considered to have five mappable sandstones. Only sandstone #1 is considered to be Arapahoe, the others Laramie. The sandstones are not mappable, but are actually lenticular in character.
6	3-6/2	The first sentence should read "Because the sandstones are interpreted to be fluvial, the sandstone lenses are not present..." The entire paragraph should be rewritten in order to be consistent with the currently accepted geologic interpretation of the sandstones at RFP.
7	3-6/4	The thickness of the alluvium cannot be less than zero feet.
8	3-6/5	Only the number one sandstone is in hydraulic connection with the alluvium. The other sandstones subcrop only in very limited areas and are not considered part of the uppermost aquifer or unconfined aquifers. Also, the conductivity values referred to here are outdated. More current information on conductivity values is available through OU1, OU2, and the site-wide characterization studies.
9	3-7/Fig. 3-3	There are several flaws in this figure. Most importantly, the sandstones No.1 and No.3 are shown several miles east of the plant site where they are known to occur. The Arapahoe and Laramie Formations are shown dipping under the plant when they are actually approximately horizontal. Even though the figure is a schematic, it is clearly inaccurate and therefore not useful.
10	3-7/3	The first sentence regarding pre-1986 well completion details is unnecessary in this paragraph.
11	3-8/3	An IHSS is not defined as an area where a hazardous substance spill has occurred. It is an area identified as having a potential for contamination. Most IHSSs have no historically documented spills.
12	3-10/1	The first mention of the IAG should be spelled out (Interagency Agreement).
13	3-10/3	The last sentence should specify the year of the background report as several exist. The most recent report was completed September 30, 1992.

# ATTACHMENT

No.	Page/Paragraph	Comment
14	3-10/5	The West Spray Field is not currently in operation as stated here. All RCRA-regulated units are currently being investigated by the IAG.
15	3-12/4	Other methods are used for drilling at RFP. The WARP field work involved a hammer rig for most new wells.
16	3-12/5	When are screens larger than 10 ft. used? When are screens placed across 2 HSUs? Avoid the word "generally" if there exist simple criteria for the exceptions. Screened intervals are not designed to detect DNAPLs or NAPLs. Sampling SOPs would have to be modified to detect DNAPLs or LNAPLs so why would the wells be screened for this purpose?
17	3-12/6	Remove: "whether floating or sinking" from this sentence. Large screened intervals were designed to sample the largest volume of the aquifer possible, not specifically for NAPL. The last sentence continues to imply that we are placing screens to detect specific contaminant zones. We place screens at the alluvial/bedrock contact or at a targeted HSU (as in the Figures 3-11 and 3-12). It is very generic and should be presented that way. DNAPLs and LNAPLs are not specifically being investigated at RFP.
18	3-15/3	The last sentence should include all methods used (8 - 8, caliper, and others) or should end: "logged by geophysical methods."
19	3-18/4	LNAPLs: Please take out references to water level measurements for LNAPLs. Wells are not measured this way. Also take out all subsequent references to NAPLs.
20	Figs. 3-5 through 3-9	Only include Figure 3-10 which contains all the wells. Leave out the five other plates (Figures 3-5 through 3-9) because they are redundant and expensive.
21	5-15/3	typo: "...Schelicher..." should be "...Schleicher..."
22	5-18/1	typo: "...QAQPS..." should be "...OAQPS..."
23	5-26/2	"...compare to..." should be "...compare with..."
24	6-1, last	"...Coal Creek..." should be "...Rock Creek..."
25	p. 6-8/1, sentence 3	"A 120-m tower will be..." should be "A 120-m tower is scheduled to be..."
26	6-8/2 last sentence	Delete last sentence.
27	12-1/3	The QAPjP addresses environmental restoration activities in Attachment 2 as "Statement of Work" and not as "Scope of Work".
28	12-7/4.12	The first mention of the acronym NIST should be spelled out (National Institute for Standards and Technology).
29	12-8/4.15	The first mention of a Nonconformance Report should include its acronym NCR.
30	13-5	typo: "Pars per million..." should be "Parts per million..."